

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

(JOSEPH A. BROOKS),

Plaintiff,

—against—

State of New York, et al.,

[7:22-cv-06283-VB]

Defendants

**Motion to Compel**

The Plaintiff, Joseph A. Brooks, moves for an Order compelling the Defendants, Timothy H. Finnegan, James Gould, and Wollman, to promptly produce all outstanding discovery, and in support, states as follows:

1. 1. That a discovery request, in the form of an informal request was emailed, in this case to Jeb Harben for Defendants Finnegan, Gould, and Wollman on July 25, 2024.
2. Initial disclosures were provided by the defendant's counsel in an email on December 6, 2024
3. The formal **discovery** requests in the form of Interrogatories were emailed to Jeb Harben for Defendants Finnegan, Gould, and Wollman on December 6, 2024.
4. On January 22, 2025, Plaintiff requested, by way of an email addressed to Defendant's counsel, that the Answers to Interrogatories be provided.
5. On February 13, 2025, Defendant's counsel, by way of an email advised Plaintiff, that the discovery he assumed had been sent long ago and were not sent to plaintiff.
6. On February 19, 2025, Plaintiff requested, by way of an email addressed to Defendant's counsel, that the Answers to Interrogatories be supplied.
7. The defendant's counsel replied by email with a link to a document cloud with a password.

8. Those documents did not contain a document production log or a document privilege log. There are unidentified and redacted documents within that discovery. There are incomplete documents within those disclosures.
  
9. The defendant's counsel has requested justification for the discovery requests.  
Rule 26 (4) *Form of Disclosures*. Unless the court orders otherwise, all disclosures under Rule 26(a) must be in writing, signed, and served.  
(b) Discovery Scope and Limits.  
(1) *Scope in General*. Unless otherwise limited by court order, the scope of discovery is as follows: Parties may obtain discovery regarding any nonprivileged matter that is relevant to any party's claim or defense and proportional to the needs of the case, considering the importance of the issues at stake in the action, the amount in controversy, the parties' relative access to relevant information, the parties' resources, the importance of the discovery in resolving the issues, and whether the burden or expense of the proposed discovery outweighs its likely benefit. Information within this scope of discovery need not be admissible in evidence to be discoverable.
  
10. That to date, Plaintiff has not received signed or certified responses to our discovery requests from any of the Defendants in this matter. The plaintiff is looking for a court order for sanctions. The plaintiff wants answers so we can proceed with the litigation without delay. The plaintiff continues to experience severe distress and experiences further emotional damage due to the failure of the Defendant's counsel to act in good faith by providing complete discovery in the form requested.

Attached Exhibits:

001 5-9-2024 Jeb Harben email.pdf  
002 5-28-2024 Brooks response to Jeb Harben email.pdf  
003 5-28-2024 response Jeb Harben to Brooks email.pdf  
004 6-21-2024 response to Jeb Harben voicemail.pdf  
005 6-21-2024 response Jeb Harben to Brooks email.pdf  
006 6-21-2024 Brooks response to Jeb Harben email.pdf  
007 7-25-2024 Brooks request to Jeb Harben for Discovery.pdf  
008 8-7-2024 Jeb Harben response Brooks discovery request.pdf  
009 8-7-2024 Brooks response to Jeb Harben request.pdf  
010 8-7-2024 Brooks response to Jeb Harben re- Discovery.pdf  
011 8-8-2024 Jeb Harben re- Depositions.pdf

012 12-04-2024 Brooks request to Jeb Harben for Discovery.pdf  
013 12-05-2024 Brooks to Jeb Harben re- Discovery extend motion.pdf  
014 12-06-2024 Jeb Harben re- Discovery extend motion.pdf  
015 12-06-2024 Jeb Harben Initial Discovery sent to Brooks.pdf  
016 12-06-2024 formal Discovery request Brooks sent to Jeb Harben.pdf  
017 1-22-2025 formal Discovery request Brooks re- sent to Jeb Harben.pdf  
018 2-13-2025 Jeb Harben re- Discovery NOT sent to Brooks.pdf  
019 2-19-2025 Jeb Harben Discovery LINK sent to Brooks.pdf  
020 2-19-2025 Jeb Harben Discovery sent to Brooks.pdf  
021 2-24-2025 Brooks sent to Jeb Harben outstanding Discovery.pdf  
022 2-25-2025 Jeb Harben outstanding Discovery response to Brooks.pdf  
023 2-25-2025 Brooks response to Jeb Harben outstanding Discovery.pdf  
024 2-25-2025 Brooks - Jeb Harben - Brooks outstanding Discovery.pdf  
025 2-26-2025 Brooks - Jeb Harben - Brooks outstanding Discovery.pdf

WHEREFORE, Plaintiff moves for an Order compelling the Defendants to produce complete and executed Answers to Interrogatories and the required documents within the next 15 days.

Respectfully submitted,

Joseph A. Brooks

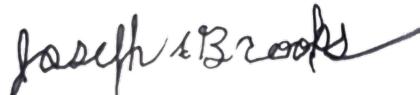
1137 Meaderboro Rd.

Farmington, NH 03835

Dated: Farmington, New Hampshire

3-03-2025

Sincerely,



[Joseph A. Brooks], Pro Se Plaintiff

Brooks v. State of New York, et al, 22 Civ. 6283 (VB)

---

From: Harben, Jeb (jeb.harben@ag.ny.gov)  
To: nh\_cherokee@yahoo.com  
Cc: Brandon.Prasad@ag.ny.gov  
Date: Thursday, May 9, 2024 at 05:45 PM EDT

---

Dear Mr. Brooks:

Enclosed please find document demands and interrogatories directed to you in the above litigation as well as releases to be executed by you for medical records, therapist notes, mental health records, employment records, Medicare/Medicaid/social security records, unsealing criminal records, as well as a Medicare affidavit that we request be executed.

These documents were mailed to you previously.

Best regards,

Jeb Harben  
Assistant Attorney General  
Office of the Attorney General State of New York  
28 Liberty Street  
New York, New York 10005  
(212) 416-6185

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-  Affirmation of Medicare Eligibility Status.pdf  
170.7kB
-  Blank 160.50 and 160.55 Unsealing Release.pdf  
93kB
-  Consent for Release of Information.SS.medicare.pdf  
685kB
-  Demands.pdf  
147.5kB
-  Form Employment Records Authorization.pdf  
189.3kB
-  HIPAA.03.11.04.wpd  
99.7kB
-  Interrogs.pdf  
141.8kB

 OMH 11C (10-11).indd.pdf  
67.2kB

 release of psychotherapy notes.pdf  
56.5kB

Re: Brooks v. State of New York, et al, 22 Civ. 6283 (VB)

---

From: Wanda Duryea (nh\_cherokee@yahoo.com)

To: jeb.harben@ag.ny.gov

Date: Tuesday, May 28, 2024 at 01:18 PM EDT

---

We are attempting to gather records. can we please request a 14 day extension from the due date of June 8, 2024.

We The People Dare to Create A More Perfect Union

On Thursday, May 9, 2024 at 05:45:13 PM EDT, Harben, Jeb <jeb.harben@ag.ny.gov> wrote:

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Re: Brooks v. State of New York, et al, 22 Civ. 6283 (VB)

---

From: Harben, Jeb (jeb.harben@ag.ny.gov)

To: nh\_cherokee@yahoo.com

Date: Tuesday, May 28, 2024 at 01:34 PM EDT

---

Ok

---

**From:** Wanda Duryea <nh\_cherokee@yahoo.com>

**Sent:** Tuesday, May 28, 2024 1:18 PM

**To:** Harben, Jeb <Jeb.Harben@ag.ny.gov>

**Subject:** Re: Brooks v. State of New York, et al, 22 Civ. 6283 (VB)

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Fw: Brooks v. State of New York, et al, 22 Civ. 6283 (VB)

---

From: Wanda Duryea (nh\_cherokee@yahoo.com)  
To: jeb.harben@ag.ny.gov; steven.schulman@ag.ny.gov  
Date: Friday, June 21, 2024 at 04:45 PM EDT

---

I spoke with Steven Schulman today after hearing your voicemail indicating that you will be out of office until November. please call me on Monday 603-923-2793 Wanda Duryea. Steven indicated a few more days would be OK to provide discovery and releases.

Thank you

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**From:** Wanda Duryea <nh\_cherokee@yahoo.com>  
**Sent:** Tuesday, May 28, 2024 1:18 PM  
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RE: Brooks v. State of New York, et al, 22 Civ. 6283 (VB)

---

From: Harben, Jeb (jeb.harben@ag.ny.gov)  
To: nh\_cherokee@yahoo.com; Steven.Schulman@ag.ny.gov  
Date: Friday, June 21, 2024 at 05:11 PM EDT

---

That's an old message from my vacation I forgot to change. Yes, not a problem.

I need to take depositions by August 9 according to this order. I will be up north of Albany July 24 for a deposition, but need to be back in NYC on July 26. Maybe we can think about depositions for Mr. Brooks and Ms. Harding that week (July 23?) at our Albany offices to save you travel? Maybe Mr. Brooks the morning and Ms. Harding in the afternoon?

---

**From:** Wanda Duryea <nh\_cherokee@yahoo.com>  
**Sent:** Friday, June 21, 2024 4:45 PM  
**To:** Harben, Jeb <Jeb.Harben@ag.ny.gov>; Schulman, Steven <Steven.Schulman@ag.ny.gov>  
**Subject:** Fw: Brooks v. State of New York, et al, 22 Civ. 6283 (VB)

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Discovery.schedule.pdf

73.6kB

Re: Brooks v. State of New York, et al, 22 Civ. 6283 (VB)

---

From: Wanda Duryea (nh\_cherokee@yahoo.com)

To: jeb.harben@ag.ny.gov

Date: Friday, June 21, 2024 at 05:20 PM EDT

---

Yes Albany is closer than NY, NY that sounds good.

Should I assume you also want to depose me?

Wanda Duryea

We The People Dare to Create A More Perfect Union

On Friday, June 21, 2024 at 05:11:46 PM EDT, Harben, Jeb <jeb.harben@ag.ny.gov> wrote:

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Re: Joseph Brooks Discovery

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From: Wanda Duryea (nh\_cherokee@yahoo.com)  
To: jeb.harben@ag.ny.gov  
Date: Thursday, July 25, 2024 at 05:11 PM EDT

---

I have been spending time trying to get everything to you and have not developed a formal discovery request. We would like any video from the barracks, the dispatch call (from the call box on the barracks) calls & texts from the defendant's phones. Any Audio or video available from that day. Medical records for the troopers, time off from their duties. any disciplinary records founded or unfounded for the defendants etc.

Joseph was assaulted inside the barracks, after he was pulled from my Jeep and initially in the parking lot. Joseph could see the video from inside the barracks. Any reports of a missing peacock around those dates 07-26-2019 going forward.

Any video or audio recording from the barracks. Substance use / misuse of Trooper Finnegan.

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On Thursday, July 25, 2024 at 04:38:01 PM EDT, Harben, Jeb <jeb.harben@ag.ny.gov> wrote:

---

I've now gone through them, they don't show me anything other than Mr. Brooks claiming off camera that he was assaulted, but I don't see anything on video confirming it.

---

**From:** Wanda Duryea <nh\_cherokee@yahoo.com>  
**Sent:** Thursday, July 25, 2024 12:49 PM  
**To:** Harben, Jeb <Jeb.Harben@ag.ny.gov>  
**Subject:** Re: Joseph Brooks Discovery

I think I was asking if you were able to access the video

We The People Dare to Create A More Perfect Union

On Thursday, July 25, 2024 at 12:37:38 PM EDT, Harben, Jeb <[jeb.harben@ag.ny.gov](mailto:jeb.harben@ag.ny.gov)> wrote:

I believe you left a message a couple of days ago but for some reason it is inaudible on my end.

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**From:** Wanda Duryea <[nh\\_cherokee@yahoo.com](mailto:nh_cherokee@yahoo.com)>

**Sent:** Tuesday, July 9, 2024 4:57 PM

**To:** Harben, Jeb <[Jeb.Harben@ag.ny.gov](mailto:Jeb.Harben@ag.ny.gov)>

**Subject:** Fw: Joseph Brooks Discovery

[EXTERNAL]

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----- Forwarded Message -----

**From:** Richard Hoover <[rhoover@laswest.org](mailto:rhoover@laswest.org)>

**To:** [nh\\_cherokee@yahoo.com](mailto:nh_cherokee@yahoo.com) <[nh\\_cherokee@yahoo.com](mailto:nh_cherokee@yahoo.com)>

**Cc:** MaryPat Long <[MPLong@laswest.org](mailto:MPLong@laswest.org)>

**Sent:** Tuesday, August 24, 2021 at 09:46:24 AM EDT

**Subject:** Joseph Brooks Discovery

Hi Wanda:

Here is the police report (attached) and a link (below) to view the videos. The names of the Troopers allegedly assaulted are Trooper Timothy Finnegan and Investigator James Wollman of the New York State Police.

The password to view the videos is JBrooks2021! [https://laswest-my.sharepoint.com/:f/g/personal/rhoover\\_laswest\\_org/Enx46\\_83xbxPg0zY7lzOuZ8B6lBAT4InawTRnGgX99Zqvwe=1t6ZSL](https://laswest-my.sharepoint.com/:f/g/personal/rhoover_laswest_org/Enx46_83xbxPg0zY7lzOuZ8B6lBAT4InawTRnGgX99Zqvwe=1t6ZSL)

Best,



## **Richard M. Hoover**

*Associate Counsel*

**The Legal Aid Society of Westchester County**

150 Grand Street

White Plains, NY 10601

914-286-3472

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RE: Joseph Brooks Discovery

---

From: Harben, Jeb (jeb.harben@ag.ny.gov)  
To: nh\_cherokee@yahoo.com  
Date: Wednesday, August 7, 2024 at 04:16 PM EDT

---

We are supposed to write the Court on 8/15 re: the status of settlement discussions, but I do not have a demand.

Also, when is Mr. Brooks available for a video/remote deposition, you, and Ms. Harding? I may have to split it up and not have it all on one day.

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**To:** [nh\\_cherokee@yahoo.com](mailto:nh_cherokee@yahoo.com) <[nh\\_cherokee@yahoo.com](mailto:nh_cherokee@yahoo.com)>  
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The password to view the videos is JBrooks2021! [https://laswest-my.sharepoint.com/:f/g/personal/rhoover\\_laswest\\_org/Enx46\\_83xbxPg0zY7lzOuZ8B6lBAT4InawTRnGgX99Zqvwe=1t6ZSL](https://laswest-my.sharepoint.com/:f/g/personal/rhoover_laswest_org/Enx46_83xbxPg0zY7lzOuZ8B6lBAT4InawTRnGgX99Zqvwe=1t6ZSL)

Best,



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White Plains, NY 10601

914-286-3472

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Re: Joseph Brooks Discovery

---

From: Wanda Duryea (nh\_cherokee@yahoo.com)  
To: jeb.harben@ag.ny.gov  
Date: Wednesday, August 7, 2024 at 04:59 PM EDT

---

Joseph has said he will settle for 1.5M. We are available almost any day as we have no vehicle.

Did you receive his discovery requests?(not formalized)

We The People Dare to Create A More Perfect Union

On Wednesday, August 7, 2024 at 04:16:44 PM EDT, Harben, Jeb <jeb.harben@ag.ny.gov> wrote:

We are supposed to write the Court on 8/15 re: the status of settlement discussions, but I do not have a demand.

Also, when is Mr. Brooks available for a video/remote deposition, you, and Ms. Harding? I may have to split it up and not have it all on one day.

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**From:** Wanda Duryea <nh\_cherokee@yahoo.com>  
**Sent:** Thursday, July 25, 2024 5:11 PM  
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**Subject:** Re: Joseph Brooks Discovery

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Any video or audio recording from the barracks. Substance use / misuse of Trooper Finnegan.

We The People Dare to Create A More Perfect Union

On Thursday, July 25, 2024 at 04:38:01 PM EDT, Harben, Jeb <[jeb.harben@ag.ny.gov](mailto:jeb.harben@ag.ny.gov)> wrote:

I've now gone through them, they don't show me anything other than Mr. Brooks claiming off camera that he was assaulted, but I don't see anything on video confirming it.

---

**From:** Wanda Duryea <[nh\\_cherokee@yahoo.com](mailto:nh_cherokee@yahoo.com)>  
**Sent:** Thursday, July 25, 2024 12:49 PM  
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**Subject:** Re: Joseph Brooks Discovery

I think I was asking if you were able to access the video

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On Thursday, July 25, 2024 at 12:37:38 PM EDT, Harben, Jeb <[jeb.harben@ag.ny.gov](mailto:jeb.harben@ag.ny.gov)> wrote:

I believe you left a message a couple of days ago but for some reason it is inaudible on my end.

---

**From:** Wanda Duryea <[nh\\_cherokee@yahoo.com](mailto:nh_cherokee@yahoo.com)>  
**Sent:** Tuesday, July 9, 2024 4:57 PM  
**To:** Harben, Jeb <[Jeb.Harben@ag.ny.gov](mailto:Jeb.Harben@ag.ny.gov)>  
**Subject:** Fw: Joseph Brooks Discovery

[EXTERNAL]

We The People Dare to Create A More Perfect Union

----- Forwarded Message -----

**From:** Richard Hoover <[rhoover@laswest.org](mailto:rhoover@laswest.org)>  
**To:** [nh\\_cherokee@yahoo.com](mailto:nh_cherokee@yahoo.com) <[nh\\_cherokee@yahoo.com](mailto:nh_cherokee@yahoo.com)>  
**Cc:** MaryPat Long <[MPLong@laswest.org](mailto:MPLong@laswest.org)>  
**Sent:** Tuesday, August 24, 2021 at 09:46:24 AM EDT  
**Subject:** Joseph Brooks Discovery

Hi Wanda:

Here is the police report (attached) and a link (below) to view the videos. The names of the Troopers allegedly assaulted are Trooper Timothy Finnegan and Investigator James Wollman of the New York State Police.

The password to view the videos is JBrooks2021! [https://laswest-my.sharepoint.com/:f/g/personal/rhoover\\_laswest\\_org/Enx46\\_83xbxPg0zY7lzOuZ8B6lBAT4InawTRnGgX99Zqvwe=1t6ZSL](https://laswest-my.sharepoint.com/:f/g/personal/rhoover_laswest_org/Enx46_83xbxPg0zY7lzOuZ8B6lBAT4InawTRnGgX99Zqvwe=1t6ZSL)

Best,



## Richard M. Hoover

*Associate Counsel*

**The Legal Aid Society of Westchester County**

150 Grand Street

White Plains, NY 10601

914-286-3472

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Re: Joseph Brooks Discovery

---

From: Wanda Duryea (nh\_cherokee@yahoo.com)  
To: jeb.harben@ag.ny.gov  
Date: Wednesday, August 7, 2024 at 05:06 PM EDT

---

In the email you just sent back to me.

We The People Dare to Create A More Perfect Union

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Did you mail something or was it in an e-mail.

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RE: Joseph Brooks Discovery

---

From: Harben, Jeb (jeb.harben@ag.ny.gov)  
To: nh\_cherokee@yahoo.com  
Date: Thursday, August 8, 2024 at 09:32 AM EDT

---

Does August 27<sup>th</sup> work for depositions for everyone? I could start with Mr. Brooks at 9, you at 1:30-2, and Ms. Harding at 3-3:30 (or switch you and Ms. Harding). The Court reporter would send a link to your e-mail address, etc. You have a video camera on your laptop?

---

**From:** Wanda Duryea <nh\_cherokee@yahoo.com>  
**Sent:** Wednesday, August 7, 2024 5:06 PM  
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[EXTERNAL]

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Re: Brooks v. State of New York, et al, 22 Civ. 6283 (VB)

---

From: Wanda Duryea (nh\_cherokee@yahoo.com)  
To: jeb.harben@ag.ny.gov  
Date: Wednesday, December 4, 2024 at 01:35 PM EST

---

I'm still waiting on Discovery from you, I really want medical records on those Troopers, the Call box recording etc.

We The People Dare to Create A More Perfect Union

On Wednesday, December 4, 2024 at 01:30:46 PM EST, Harben, Jeb <jeb.harben@ag.ny.gov> wrote:

OK, thanks. I cannot get the records to confirm the injury claims without those releases signed though.

You can send me a signed one for medical and one for mental health and I will put in all the addresses and send them to you so that you know what is going out so you won't need to get 20 documents notarized, just one of each type

---

**From:** Wanda Duryea <nh\_cherokee@yahoo.com>  
**Sent:** Wednesday, December 4, 2024 12:27 PM  
**To:** Harben, Jeb <Jeb.Harben@ag.ny.gov>  
**Subject:** Re: Brooks v. State of New York, et al, 22 Civ. 6283 (VB)

We The People Dare to Create A More Perfect Union

On Monday, December 2, 2024 at 01:05:31 PM EST, Harben, Jeb <[jeb.harben@ag.ny.gov](mailto:jeb.harben@ag.ny.gov)> wrote:

Try this

---

**From:** Wanda Duryea <[nh\\_cherokee@yahoo.com](mailto:nh_cherokee@yahoo.com)>  
**Sent:** Monday, December 2, 2024 1:03 PM  
**To:** Harben, Jeb <[Jeb.Harben@ag.ny.gov](mailto:Jeb.Harben@ag.ny.gov)>  
**Subject:** Re: Brooks v. State of New York, et al, 22 Civ. 6283 (VB)

HIPAA.03.11.04.wpd?

will not open

We The People Dare to Create A More Perfect Union

On Monday, December 2, 2024 at 12:41:27 PM EST, Harben, Jeb <[jeb.harben@ag.ny.gov](mailto:jeb.harben@ag.ny.gov)> wrote:

I need the 160.50 release I sent (first attachment above)

And I need the mental health release and medical release if he received any treatment related to these matters.

If he did not receive any mental health treatment or medical treatment in connection with the allegations raised in the lawsuit, please advise.

---

**From:** Wanda Duryea <[nh\\_cherokee@yahoo.com](mailto:nh_cherokee@yahoo.com)>  
**Sent:** Monday, December 2, 2024 12:38 PM  
**To:** Harben, Jeb <[Jeb.Harben@ag.ny.gov](mailto:Jeb.Harben@ag.ny.gov)>  
**Subject:** Re: Brooks v. State of New York, et al, 22 Civ. 6283 (VB)

**[EXTERNAL]**

If there something else needed please let me know.

We The People Dare to Create A More Perfect Union

On Monday, December 2, 2024 at 11:25:34 AM EST, Harben, Jeb <[jeb.harben@ag.ny.gov](mailto:jeb.harben@ag.ny.gov)> wrote:

I really do need these things. My office won't process a settlement without them. I really need the 160.50 release back ASAP.

---

**From:** Harben, Jeb  
**Sent:** Thursday, May 9, 2024 5:45 PM  
**To:** [nh\\_cherokee@yahoo.com](mailto:nh_cherokee@yahoo.com)  
**Cc:** Prasad, Brandon <[Brandon.Prasad@ag.ny.gov](mailto:Brandon.Prasad@ag.ny.gov)>  
**Subject:** Brooks v. State of New York, et al, 22 Civ. 6283 (VB)

Dear Mr. Brooks:

Enclosed please find document demands and interrogatories directed to you in the above litigation as well as releases to be executed by you for medical records, therapist notes, mental health records, employment records, Medicare/Medicaid/social security records, unsealing criminal records, as well as a Medicare affidavit that we request be executed.

These documents were mailed to you previously.

Best regards,

Jeb Harben  
Assistant Attorney General  
Office of the Attorney General State of New York  
28 Liberty Street  
New York, New York 10005  
(212) 416-6185

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## Motion to Extend Discovery

---

From: Wanda Duryea (nh\_cherokee@yahoo.com)  
To: jeb.harben@ag.ny.gov  
Bcc: jtaylor@nycbar.org  
Date: Thursday, December 5, 2024 at 07:23 PM EST

---

Jeb;

can I get your concurrence to this motion please.

Joseph Brooks

We The People Dare to Create A More Perfect Union



J Motion Extend Discovery 7-22-cv-06283-VB.pdf  
285kB

RE: Motion to Extend Discovery

---

From: Harben, Jeb (jeb.harben@ag.ny.gov)  
To: nh\_cherokee@yahoo.com  
Date: Friday, December 6, 2024 at 10:26 AM EST

---

This isn't necessary. I will write today like I did in the past and ask for another month? The judge wants me to attach a new scheduling order

---

**From:** Wanda Duryea <nh\_cherokee@yahoo.com>  
**Sent:** Thursday, December 5, 2024 7:23 PM  
**To:** Harben, Jeb <Jeb.Harben@ag.ny.gov>  
**Subject:** Motion to Extend Discovery

[EXTERNAL]

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Brooks

---

From: Harben, Jeb (jeb.harben@ag.ny.gov)  
To: nh\_cherokee@yahoo.com  
Date: Friday, December 6, 2024 at 10:56 AM EST

---

I saw disclosures in the directory that I had assumed Jen sent long ago, but I guess she did not. Here they are updated with my name on them.

---

**From:** Harben, Jeb  
**Sent:** Friday, December 6, 2024 10:27 AM  
**To:** Wanda Duryea <nh\_cherokee@yahoo.com>  
**Subject:** RE: Motion to Extend Discovery

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brooks.initial.disclosures.12.6.24.pdf

156.7kB

Fw: Brooks Defendant Interrogatories 12/06/2024 still no response

---

From: Wanda Duryea ([nh\\_cherokee@yahoo.com](mailto:nh_cherokee@yahoo.com))  
To: [jeb.harben@ag.ny.gov](mailto:jeb.harben@ag.ny.gov)  
Date: Wednesday, January 22, 2025 at 10:57 AM EST

---

We The People Dare to Create A More Perfect Union

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**From:** Wanda Duryea <[nh\\_cherokee@yahoo.com](mailto:nh_cherokee@yahoo.com)>  
**To:** Harben, Jeb <[jeb.harben@ag.ny.gov](mailto:jeb.harben@ag.ny.gov)>  
**Sent:** Friday, December 6, 2024 at 11:59:33 AM EST  
**Subject:** Re: Brooks

Here are the formal discovery requests

We The People Dare to Create A More Perfect Union

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**From:** Wanda Duryea <[nh\\_cherokee@yahoo.com](mailto:nh_cherokee@yahoo.com)>  
**Sent:** Thursday, December 5, 2024 7:23 PM  
**To:** Harben, Jeb <[Jeb.Harben@ag.ny.gov](mailto:Jeb.Harben@ag.ny.gov)>  
**Subject:** Motion to Extend Discovery

[EXTERNAL]

Jeb;

can I get your concurrence to this motion please.

Joseph Brooks

We The People Dare to Create A More Perfect Union

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-  Finnegan Discovery Request.pdf  
210.5kB
-  Gould Discovery Request.pdf  
192.2kB
-  Wollman Discovery Request.pdf  
210.6kB

Fw: Brooks Defendant Interrogatories 12/06/2024 still no response

---

From: Wanda Duryea ([nh\\_cherokee@yahoo.com](mailto:nh_cherokee@yahoo.com))  
To: [jeb.harben@ag.ny.gov](mailto:jeb.harben@ag.ny.gov)  
Date: Wednesday, January 22, 2025 at 10:57 AM EST

---

We The People Dare to Create A More Perfect Union

----- Forwarded Message -----

**From:** Wanda Duryea <[nh\\_cherokee@yahoo.com](mailto:nh_cherokee@yahoo.com)>  
**To:** Harben, Jeb <[jeb.harben@ag.ny.gov](mailto:jeb.harben@ag.ny.gov)>  
**Sent:** Friday, December 6, 2024 at 11:59:33 AM EST  
**Subject:** Re: Brooks

Here are the formal discovery requests

We The People Dare to Create A More Perfect Union

On Friday, December 6, 2024 at 10:56:38 AM EST, Harben, Jeb <[jeb.harben@ag.ny.gov](mailto:jeb.harben@ag.ny.gov)> wrote:

I saw disclosures in the directory that I had assumed Jen sent long ago, but I guess she did not. Here they are updated with my name on them.

---

**From:** Harben, Jeb  
**Sent:** Friday, December 6, 2024 10:27 AM  
**To:** Wanda Duryea <[nh\\_cherokee@yahoo.com](mailto:nh_cherokee@yahoo.com)>  
**Subject:** RE: Motion to Extend Discovery

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**From:** Wanda Duryea <[nh\\_cherokee@yahoo.com](mailto:nh_cherokee@yahoo.com)>  
**Sent:** Thursday, December 5, 2024 7:23 PM  
**To:** Harben, Jeb <[Jeb.Harben@ag.ny.gov](mailto:Jeb.Harben@ag.ny.gov)>  
**Subject:** Motion to Extend Discovery

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-  Finnegan Discovery Request.pdf  
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192.2kB
-  Wollman Discovery Request.pdf  
210.6kB

Brooks

---

From: Harben, Jeb (jeb.harben@ag.ny.gov)  
To: nh\_cherokee@yahoo.com  
Date: Thursday, February 13, 2025 at 01:55 PM EST

---

It has come to my attention that the records I thought my paralegal sent to you months ago were not sent due to an oversight. While most of them already seem to be in your possession, it is not complete overlap. I am going through them now.

I think we need another month to clean up discovery in this case if you consent and the judge agrees. I have the responses to your discovery requests ready, but I wanted to send them with you in possession of the documents and I see that not everything has bates numbers on them so I am working on that.

I still need to take your depositions, which I think is in your interest as well in the event that any of you cannot come to White Plains if there is a trial.

If I am going to ask for more time I need to get the letter out today.

Jeb Harben  
Assistant Attorney General  
New York Office of the Attorney General  
28 Liberty Street  
New York, New York 10005  
(212) 416-6185

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Brooks

---

From: Harben, Jeb (jeb.harben@ag.ny.gov)  
To: nh\_cherokee@yahoo.com  
Date: Wednesday, February 19, 2025 at 03:29 PM EST

---

<https://oagcloud.ag.ny.gov/s/GPXQkWTpnCqJ8gt>

Password: BrooksProduction2025\*

Jeb Harben  
Assistant Attorney General  
New York Office of the Attorney General  
28 Liberty Street  
New York, New York 10005  
(212) 416-6185

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2.13.25.discovery.pdf

183.1kB

Re: Brooks

---

From: Wanda Duryea ([nh\\_cherokee@yahoo.com](mailto:nh_cherokee@yahoo.com))  
To: [jeb.harben@ag.ny.gov](mailto:jeb.harben@ag.ny.gov)  
Date: Wednesday, February 19, 2025 at 04:00 PM EST

---

The discovery you sent does not begin to fulfill those requests.

We The People Dare to Create A More Perfect Union

On Wednesday, February 19, 2025 at 03:45:47 PM EST, Harben, Jeb <[jeb.harben@ag.ny.gov](mailto:jeb.harben@ag.ny.gov)> wrote:

This is what you sent me. They're document requests.

---

**From:** Wanda Duryea <[nh\\_cherokee@yahoo.com](mailto:nh_cherokee@yahoo.com)>  
**Sent:** Friday, December 6, 2024 12:00 PM  
**To:** Harben, Jeb <[Jeb.Harben@ag.ny.gov](mailto:Jeb.Harben@ag.ny.gov)>  
**Subject:** Re: Brooks

Here are the formal discovery requests

We The People Dare to Create A More Perfect Union

On Friday, December 6, 2024 at 10:56:38 AM EST, Harben, Jeb <[jeb.harben@ag.ny.gov](mailto:jeb.harben@ag.ny.gov)> wrote:

I saw disclosures in the directory that I had assumed Jen sent long ago, but I guess she did not. Here they are updated with my name on them.

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**From:** Harben, Jeb  
**Sent:** Friday, December 6, 2024 10:27 AM  
**To:** Wanda Duryea <[nh\\_cherokee@yahoo.com](mailto:nh_cherokee@yahoo.com)>  
**Subject:** RE: Motion to Extend Discovery

This isn't necessary. I will write today like I did in the past and ask for another month? The judge wants me to attach a new scheduling order

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**From:** Wanda Duryea <[nh\\_cherokee@yahoo.com](mailto:nh_cherokee@yahoo.com)>  
**Sent:** Thursday, December 5, 2024 7:23 PM  
**To:** Harben, Jeb <[Jeb.Harben@ag.ny.gov](mailto:Jeb.Harben@ag.ny.gov)>  
**Subject:** Motion to Extend Discovery

**[EXTERNAL]**

Jeb;

can I get your concurrence to this motion please.

Joseph Brooks

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Re: Brooks Discovery Requests

---

From: Wanda Duryea (nh\_cherokee@yahoo.com)  
To: jeb.harben@ag.ny.gov  
Date: Monday, February 24, 2025 at 04:40 PM EST

---

Do you plan on supplying the outstanding discovery requests or do we need to file a motion to compel?

We The People Dare to Create A More Perfect Union

On Wednesday, February 19, 2025 at 04:00:05 PM EST, Wanda Duryea <nh\_cherokee@yahoo.com> wrote:

The discovery you sent does not begin to fulfill those requests.

We The People Dare to Create A More Perfect Union

On Wednesday, February 19, 2025 at 03:45:47 PM EST, Harben, Jeb <jeb.harben@ag.ny.gov> wrote:

This is what you sent me. They're document requests.

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**From:** Wanda Duryea <nh\_cherokee@yahoo.com>  
**Sent:** Friday, December 6, 2024 12:00 PM  
**To:** Harben, Jeb <Jeb.Harben@ag.ny.gov>  
**Subject:** Re: Brooks

Here are the formal discovery requests

We The People Dare to Create A More Perfect Union

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**To:** Wanda Duryea <[nh\\_cherokee@yahoo.com](mailto:nh_cherokee@yahoo.com)>  
**Subject:** RE: Motion to Extend Discovery

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**To:** Harben, Jeb <[Jeb.Harben@ag.ny.gov](mailto:Jeb.Harben@ag.ny.gov)>  
**Subject:** Motion to Extend Discovery

[EXTERNAL]

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Joseph Brooks

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RE: Brooks Discovery Requests

---

From: Harben, Jeb (jeb.harben@ag.ny.gov)  
To: nh\_cherokee@yahoo.com  
Date: Tuesday, February 25, 2025 at 11:25 AM EST

---

What do you think wasn't in there? If there are no records concerning peacocks or any of that I have nothing to give you.

---

**From:** Wanda Duryea <nh\_cherokee@yahoo.com>  
**Sent:** Monday, February 24, 2025 4:41 PM  
**To:** Harben, Jeb <Jeb.Harben@ag.ny.gov>  
**Subject:** Re: Brooks Discovery Requests

Do you plan on supplying the outstanding discovery requests or do we need to file a motion to compel?

We The People Dare to Create A More Perfect Union

On Wednesday, February 19, 2025 at 04:00:05 PM EST, Wanda Duryea <nh\_cherokee@yahoo.com> wrote:

The discovery you sent does not begin to fulfill those requests.

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This is what you sent me. They're document requests.

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**To:** Harben, Jeb <Jeb.Harben@ag.ny.gov>  
**Subject:** Re: Brooks

Here are the formal discovery requests

We The People Dare to Create A More Perfect Union

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Re: Brooks Discovery Requests

---

From: Wanda Duryea (nh\_cherokee@yahoo.com)  
To: jeb.harben@ag.ny.gov  
Date: Tuesday, February 25, 2025 at 02:27 PM EST

---

I want to know the specifics of the equipment and the records of any repairs.

The officers took time off work - they lied and we are entitled to the medical records. OK I will just file a motion to compel.

We The People Dare to Create A More Perfect Union

On Tuesday, February 25, 2025 at 01:57:17 PM EST, Harben, Jeb <jeb.harben@ag.ny.gov> wrote:

There is no video at the station. The cameras do not record.

The audio from the call box was not kept.

What medical records? Brooks's medical records? We don't have those. Defendants had scrapes, which can be seen in the photographs, there are no medical records, they're not claiming long term injuries. You're not entitled to their medical histories, it isn't relevant and is a violation of their privacy.

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**From:** Wanda Duryea <nh\_cherokee@yahoo.com>  
**Sent:** Tuesday, February 25, 2025 12:57 PM  
**To:** Harben, Jeb <Jeb.Harben@ag.ny.gov>  
**Subject:** Re: Brooks Discovery Requests

video at the station, audio of call box, medical records etc.

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On Tuesday, February 25, 2025 at 11:25:08 AM EST, Harben, Jeb <[jeb.harben@ag.ny.gov](mailto:jeb.harben@ag.ny.gov)> wrote:

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**Sent:** Monday, February 24, 2025 4:41 PM  
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**To:** Harben, Jeb <[Jeb.Harben@ag.ny.gov](mailto:Jeb.Harben@ag.ny.gov)>  
**Subject:** Re: Brooks

Here are the formal discovery requests

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**To:** Wanda Duryea <[nh\\_cherokee@yahoo.com](mailto:nh_cherokee@yahoo.com)>  
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**Sent:** Thursday, December 5, 2024 7:23 PM  
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Re: Brooks Discovery Requests

---

From: Wanda Duryea (nh\_cherokee@yahoo.com)  
To: jeb.harben@ag.ny.gov  
Date: Tuesday, February 25, 2025 at 10:55 PM EST

---

I want ALL video and AUDIO from that day, radio communications cell phone everything.

We The People Dare to Create A More Perfect Union

On Tuesday, February 25, 2025 at 10:00:52 PM EST, Harben, Jeb <jeb.harben@ag.ny.gov> wrote:

So are you asking whether his interview was recorded, not whether the parking lot was recorded?

---

**From:** Wanda Duryea <nh\_cherokee@yahoo.com>  
**Sent:** Tuesday, February 25, 2025 4:49 PM  
**To:** Harben, Jeb <Jeb.Harben@ag.ny.gov>  
**Subject:** Re: Brooks Discovery Requests

see attachment - video recording

We The People Dare to Create A More Perfect Union

On Tuesday, February 25, 2025 at 03:10:26 PM EST, Harben, Jeb <[jeb.harben@ag.ny.gov](mailto:jeb.harben@ag.ny.gov)> wrote:

It did not record, what do the repairs have to do with it?

They say they did not take time off from work.

---

**From:** Wanda Duryea <[nh\\_cherokee@yahoo.com](mailto:nh_cherokee@yahoo.com)>  
**Sent:** Tuesday, February 25, 2025 2:28 PM  
**To:** Harben, Jeb <[Jeb.Harben@ag.ny.gov](mailto:Jeb.Harben@ag.ny.gov)>  
**Subject:** Re: Brooks Discovery Requests

I want to know the specifics of the equipment and the records of any repairs.

The officers took time off work - they lied and we are entitled to the medical records. OK I will just file a motion to compel.

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**Sent:** Monday, February 24, 2025 4:41 PM  
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**Subject:** Re: Brooks Discovery Requests

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**Sent:** Friday, December 6, 2024 12:00 PM  
**To:** Harben, Jeb <[Jeb.Harben@ag.ny.gov](mailto:Jeb.Harben@ag.ny.gov)>  
**Subject:** Re: Brooks

Here are the formal discovery requests

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**Subject:** RE: Motion to Extend Discovery

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**From:** Wanda Duryea <[nh\\_cherokee@yahoo.com](mailto:nh_cherokee@yahoo.com)>  
**Sent:** Thursday, December 5, 2024 7:23 PM  
**To:** Harben, Jeb <[Jeb.Harben@ag.ny.gov](mailto:Jeb.Harben@ag.ny.gov)>  
**Subject:** Motion to Extend Discovery

**[EXTERNAL]**

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Joseph Brooks

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## Re: Brooks Discovery Requests

---

From: Wanda Duryea (nh\_cherokee@yahoo.com)  
To: jeb.harben@ag.ny.gov  
Date: Wednesday, February 26, 2025 at 01:59 PM EST

---

NH has a law that they don't give any records to parolees

We The People Dare to Create A More Perfect Union

On Wednesday, February 26, 2025 at 01:48:21 PM EST, Harben, Jeb <jeb.harben@ag.ny.gov> wrote:

If these forms were signed by someone at NYSP weren't they given to Brooks's parole officer? Why doesn't New Hampshire have them? I seriously doubt something from 2011 was kept by NYSP. I've asked. You haven't even given any specific dates within a nearly ten-year range.

The bodycam policy was not implemented until April 2021.

---

**From:** Wanda Duryea <nh\_cherokee@yahoo.com>  
**Sent:** Wednesday, February 26, 2025 1:14 PM  
**To:** Harben, Jeb <Jeb.Harben@ag.ny.gov>  
**Subject:** Re: Brooks Discovery Requests

I disagree. 1 police station 1 camera system that supposedly didn't record the New York State police beating and violating my sons civil and human rights. Those same Police officers who took my Neice's gun out of my suitcase and planted it in my son's laptop bag; then beat him and filed false charges against him. 1 stole his paperwork. How about dash cam video from the cruiser or a body cam?

Another request we have is any other travel forms signed at that station for my son by other officers. there were at least 2 other occasions we had travel forms signed there (at that location) and they always took a copy. dated between 2011 and 2019.

please just put your responses on my discovery request and we will let the judge decide what is unreasonable.

We The People Dare to Create A More Perfect Union

On Wednesday, February 26, 2025 at 01:02:23 PM EST, Harben, Jeb <[jeb.harben@ag.ny.gov](mailto:jeb.harben@ag.ny.gov)> wrote:

You are asking for completely irrelevant and overly burdensome things unless you can explain to me why they're relevant.

---

**From:** Wanda Duryea <[nh\\_cherokee@yahoo.com](mailto:nh_cherokee@yahoo.com)>  
**Sent:** Wednesday, February 26, 2025 12:59 PM  
**To:** Harben, Jeb <[Jeb.Harben@ag.ny.gov](mailto:Jeb.Harben@ag.ny.gov)>  
**Subject:** Re: Brooks Discovery Requests

I do not need to give you reasons to produce discovery. We are asking for the system information, any repair records and the technician or company that services it.

We The People Dare to Create A More Perfect Union

On Wednesday, February 26, 2025 at 11:03:23 AM EST, Harben, Jeb <[jeb.harben@ag.ny.gov](mailto:jeb.harben@ag.ny.gov)> wrote:

What do repair records have to do with anything?

---

**From:** Wanda Duryea <[nh\\_cherokee@yahoo.com](mailto:nh_cherokee@yahoo.com)>  
**Sent:** Wednesday, February 26, 2025 8:42 AM  
**To:** Harben, Jeb <[Jeb.Harben@ag.ny.gov](mailto:Jeb.Harben@ag.ny.gov)>  
**Subject:** Re: Brooks Discovery Requests

OK I get that you are being told that there is nothing. I want a discovery statement to that effect. indicating for each request. I want the video system specifications; repair records or requests and we will ask the judge. What these supposed officers did to my son damaged him more than 10 years in prison.

The State of NY is legally & morally responsible to him.

We The People Dare to Create A More Perfect Union

On Wednesday, February 26, 2025 at 12:00:34 AM EST, Harben, Jeb <[jeb.harben@ag.ny.gov](mailto:jeb.harben@ag.ny.gov)> wrote:

I have been informed that there is none.

---

**From:** Wanda Duryea <[nh\\_cherokee@yahoo.com](mailto:nh_cherokee@yahoo.com)>  
**Sent:** Tuesday, February 25, 2025 10:56 PM  
**To:** Harben, Jeb <[Jeb.Harben@ag.ny.gov](mailto:Jeb.Harben@ag.ny.gov)>  
**Subject:** Re: Brooks Discovery Requests

I want ALL video and AUDIO from that day, radio communications cell phone everything.

We The People Dare to Create A More Perfect Union

On Tuesday, February 25, 2025 at 10:00:52 PM EST, Harben, Jeb <[jeb.harben@ag.ny.gov](mailto:jeb.harben@ag.ny.gov)> wrote:

So are you asking whether his interview was recorded, not whether the parking lot was recorded?

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**From:** Wanda Duryea <[nh\\_cherokee@yahoo.com](mailto:nh_cherokee@yahoo.com)>  
**Sent:** Tuesday, February 25, 2025 4:49 PM  
**To:** Harben, Jeb <[Jeb.Harben@ag.ny.gov](mailto:Jeb.Harben@ag.ny.gov)>  
**Subject:** Re: Brooks Discovery Requests

see attachment - video recording

We The People Dare to Create A More Perfect Union

On Tuesday, February 25, 2025 at 03:10:26 PM EST, Harben, Jeb <[jeb.harben@ag.ny.gov](mailto:jeb.harben@ag.ny.gov)> wrote:

It did not record, what do the repairs have to do with it?

They say they did not take time off from work.

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**From:** Wanda Duryea <[nh\\_cherokee@yahoo.com](mailto:nh_cherokee@yahoo.com)>

**Sent:** Tuesday, February 25, 2025 2:28 PM

**To:** Harben, Jeb <[Jeb.Harben@ag.ny.gov](mailto:Jeb.Harben@ag.ny.gov)>

**Subject:** Re: Brooks Discovery Requests

I want to know the specifics of the equipment and the records of any repairs.

The officers took time off work - they lied and we are entitled to the medical records. OK I will just file a motion to compel.

We The People Dare to Create A More Perfect Union

On Tuesday, February 25, 2025 at 01:57:17 PM EST, Harben, Jeb <[jeb.harben@ag.ny.gov](mailto:jeb.harben@ag.ny.gov)> wrote:

There is no video at the station. The cameras do not record.

The audio from the call box was not kept.

What medical records? Brooks's medical records? We don't have those. Defendants had scrapes, which can be seen in the photographs, there are no medical records, they're not claiming long term injuries. You're not entitled to their medical histories, it isn't relevant and is a violation of their privacy.

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**From:** Wanda Duryea <[nh\\_cherokee@yahoo.com](mailto:nh_cherokee@yahoo.com)>

**Sent:** Tuesday, February 25, 2025 12:57 PM

**To:** Harben, Jeb <[Jeb.Harben@ag.ny.gov](mailto:Jeb.Harben@ag.ny.gov)>

**Subject:** Re: Brooks Discovery Requests

video at the station, audio of call box, medical records etc.

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On Tuesday, February 25, 2025 at 11:25:08 AM EST, Harben, Jeb <[jeb.harben@ag.ny.gov](mailto:jeb.harben@ag.ny.gov)> wrote:

What do you think wasn't in there? If there are no records concerning peacocks or any of that I have nothing to give you.

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**From:** Wanda Duryea <[nh\\_cherokee@yahoo.com](mailto:nh_cherokee@yahoo.com)>  
**Sent:** Monday, February 24, 2025 4:41 PM  
**To:** Harben, Jeb <[Jeb.Harben@ag.ny.gov](mailto:Jeb.Harben@ag.ny.gov)>  
**Subject:** Re: Brooks Discovery Requests

Do you plan on supplying the outstanding discovery requests or do we need to file a motion to compel?

We The People Dare to Create A More Perfect Union

On Wednesday, February 19, 2025 at 04:00:05 PM EST, Wanda Duryea <[nh\\_cherokee@yahoo.com](mailto:nh_cherokee@yahoo.com)> wrote:

The discovery you sent does not begin to fulfill those requests.

We The People Dare to Create A More Perfect Union

On Wednesday, February 19, 2025 at 03:45:47 PM EST, Harben, Jeb <[jeb.harben@ag.ny.gov](mailto:jeb.harben@ag.ny.gov)> wrote:

This is what you sent me. They're document requests.

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**From:** Wanda Duryea <[nh\\_cherokee@yahoo.com](mailto:nh_cherokee@yahoo.com)>  
**Sent:** Friday, December 6, 2024 12:00 PM

**To:** Harben, Jeb <[Jeb.Harben@ag.ny.gov](mailto:Jeb.Harben@ag.ny.gov)>  
**Subject:** Re: Brooks

Here are the formal discovery requests

We The People Dare to Create A More Perfect Union

On Friday, December 6, 2024 at 10:56:38 AM EST, Harben, Jeb <[jeb.harben@ag.ny.gov](mailto:jeb.harben@ag.ny.gov)> wrote:

I saw disclosures in the directory that I had assumed Jen sent long ago, but I guess she did not. Here they are updated with my name on them.

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**From:** Harben, Jeb  
**Sent:** Friday, December 6, 2024 10:27 AM  
**To:** Wanda Duryea <[nh\\_cherokee@yahoo.com](mailto:nh_cherokee@yahoo.com)>  
**Subject:** RE: Motion to Extend Discovery

This isn't necessary. I will write today like I did in the past and ask for another month? The judge wants me to attach a new scheduling order

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**From:** Wanda Duryea <[nh\\_cherokee@yahoo.com](mailto:nh_cherokee@yahoo.com)>  
**Sent:** Thursday, December 5, 2024 7:23 PM  
**To:** Harben, Jeb <[Jeb.Harben@ag.ny.gov](mailto:Jeb.Harben@ag.ny.gov)>  
**Subject:** Motion to Extend Discovery

[EXTERNAL]

Jeb;

can I get your concurrence to this motion please.

Joseph Brooks

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